

May 10, 2004

Sarah Loftus McLallen  
ACC Petroleum Additives Panel  
American Chemistry Council  
1300 Wilson Boulevard  
Arlington, VA 22209

Dear Ms. McLallen:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Phenol, heptyl derivatives posted on the ChemRTK HPV Challenge Program Web site on January 14, 2004. I commend the Petroleum Additives Panel Health, Environmental, and Regulatory Task Group (HERTG) for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. The submitter needs to provide robust summaries for melting point, boiling point, vapor pressure, photodegradation, and stability in water and indicate whether the values were measured or calculated. EPA recommends the use of the Level III fugacity model.
2. Health Effects. EPA agrees with the test plan for these endpoints. In the test plan the submitter needs to include the range finding results from the proposed OECD TG 422 study into the acute toxicity discussion and add the <2,000 mg/kg acute value to Table 1 in Section 8.
3. Ecological Effects. EPA agrees with the test plan for these endpoints. Although the acute fish test was done in a salt water species, EPA will assume that similar toxicity will occur in fresh water species.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that HERTG advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov).

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

Enclosure

cc: W. Penberthy  
M. E. Weber